MSC

MIDWEST STERILIZATION CORPORATION
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July 5, 2017

Texas Commission on Environmental Quality
MC 172
P.O. Box 13087
Austin, Texas 78711

Re: Permit Number: 55557
Commercial Sterilization Facility
Laredo, Webb County
Regulated Entity Number: RN103376901
Customer Reference Number: CN602788465

Dear TCEQ:

Midwest Sterilization Corporation (MSC) is subject to 40 CFR 63, Subpart O, *Ethylene Oxide Emission Standards for Sterilization Facilities*. 40 CFR 63.10(e)(3) requires submission of semi-annual summary reports for continuous monitoring systems.

Accordingly, a summary report is being provided of continuous monitoring system performance for the wet scrubber used to control sterilization chamber vents and the safe cell used to control aeration exhausts for the period of 1/1/17 through 6/30/17.

If the agency has any questions regarding these semi-annual summary reports please let me know.

Sincerely yours,

Wayne Fitzpatrick

Wayne Fitzpatrick
Vice President

Enclosures

cc: USEPA Region VI
TCEQ Region 16 - Laredo

Summary Report - Gaseous and Continuous Monitoring System Performance

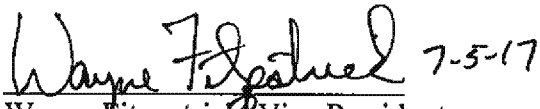
Name and address of source	Midwest Sterilization Corporation 12010 General Milton Drive Laredo, TX 78045
Hazardous Air Pollutant monitored	Ethylene Oxide
Reporting period	January 1, 2017 through June 30, 2017
Brief description of the process units	**Acid water scrubber** which controls emissions from all the sterilization chamber's evacuation vents.
Emission and operating parameter limitation specified in the relevant standard	The maximum ethylene glycol concentration of the acid water scrubber solution was determined to be 45.0% from the average ethylene glycol concentration established in the performance test completed 4/7/16. A grab sample of the acid water scrubber solution is collected and analyzed once each week to verify the ethylene glycol concentration was below 45.0%. Weekly acid water solution testing is also conducted to verify that the solution pH was below 2.0 for the entire period.
Monitoring equipment manufacturer and model number	Misco Products Division, Model # DFR204 Refractometer. Oakton pH Testr 2.
Date of latest CEMS certification or audit	Refractometer and pH tester are calibrated monthly. The most recent calibrations were completed on 06/01/17.
Total operating time during the reporting period	26 weeks continuous operation (181 days), equivalent to 4344 hours.
Emission summary data	See Attached Table 1 Summary
CEMS performance summary	See Attached Table 2 Summary
A description of any changes in CEMS, processes, or controls since the last reporting period	None
Name, title and signature of responsible official certifying the accuracy of the report	 7-5-17 Wayne Fitzpatrick, Vice President
Date of the report	July 05, 2017

Table 1

6 month report for period ending 06/30/17

Emission Data Summary – Acid Water Scrubber Ethylene Glycol Concentration Exceedances			
Description	Hours during the reporting period	Duration of excess emissions	Comments
Total wet scrubber operating time during the reporting period.	4344	NA	None
Total amount of time of glycol concentration exceedances during the reporting period due to start up or shutdown.	-0-	0.0%	None
Total amount of time of glycol concentration exceedances during the reporting period due to control equipment problems.	-0-	0.0%	None
Total amount of time of glycol concentration exceedances during the reporting period due to process problems.	-0-	0.0%	None
Total amount of time of glycol concentration exceedances during the reporting period due to other causes.	-0-	0.0%	None
Total amount of time of glycol concentration exceedances during the reporting period.	-0-	0.0% [1]	There were no weeks when monitoring indicated any exceedances.

[1] If the duration of excess emissions is less than 1.0%, only a summary report is required as long as the CMS downtime reported on Table 2 is also less than 5%. Otherwise, both a summary report and an excess emissions and continuous monitoring system performance report is required.

Table 2

6 month report for period ending 06/30/17

CMS Performance Summary – Acid Water Scrubber Ethylene Glycol Concentration Exceedances			
Description	Hours during the reporting period	Duration of excess emissions	Comments
Total amount of CMS downtime due to monitoring equipment malfunctions.	-0-	0.00%	None
Total amount of CMS downtime due to non-monitoring equipment malfunctions.	-0-	0.00%	None
Total amount of CMS downtime due to quality assurance/control calibrations.	-0-	0.00%	None
Total amount of CMS downtime due to other known causes.	-0-	0.00%	None
Total amount of time during the reporting period of CMS downtime.	-0-	0.00%	[1] [2] There was no CMS downtime during the 26 week period.

[1] If the duration of excess emissions for CMS downtime is less than 5%, only a summary report is required as long as the duration of excess emissions reported on Table 1 is also less than 1%. Otherwise, both a summary report and an excess emissions and continuous monitoring system performance report is required.

[2] 40 CFR Part 63.364(b)(1) requires the operator to comply with monitoring requirements by sampling, analyzing and recording the scrubber liquor ethylene glycol concentration once per week. This sampling was conducted during each week of the reporting period.

Summary Report – Gaseous and Continuous Monitoring System Performance

Name and address of source	Midwest Sterilization Corporation 12010 General Milton Drive Laredo, TX 78045
Hazardous air pollutant monitored	Ethylene Oxide
Reporting period	January 1, 2017 through June 30, 2017
Brief description of the process units	**Safe Cell** control device which controls emissions from all the aeration rooms vents.
Emission and operating parameter limitation specified in the relevant standard	40 CFR 63.362(d) requires reduction of aeration room vent emissions to a maximum concentration of 1 ppm by volume. Note: In a letter dated May 23, 2006, EPA Region 6 granted MSC permission for an alternative monitoring plan, allowing a tiered approach to sampling frequency for demonstrating compliance with the aeration room standard.
Monitoring equipment manufacturer and model number	Shimadzu Scientific Instruments, Inc., GC-2014 series gas chromatograph.
Date of latest CMS certification or audit	GC calibrations are performed using a nominal 1 ppm bottled ethylene oxide standard. GC Calibration error checks are performed at three concentration levels prior to sample analysis. Date of the latest GC calibration error checks was 06/09/17.
Total operating time during the reporting period	26 weeks continuous operation (181 days), equivalent to 4344 hours.
Emission summary data	See attached Table 3 Summary
CMS performance summary	See attached Table 4 Summary and test summary
A description of any changes in CMS, processes, or controls since the last reporting period	None
Name, title and signature of responsible official certifying the accuracy of the report	Wayne Fitzpatrick, Vice President
Date of the report	July 05, 2017

Table 3

6 month report for period ending 06/30/17

Emission Data Summary – Safe Cell Ethylene Oxide Emission Concentration Exceedances			
Description	Hours during the reporting period	Duration of excess emissions	Comments
Total Safe Cell operating time during the reporting period.	4344	N/A	None
Total amount of time of ethylene oxide emission concentration exceedances during the reporting period due to start up, shutdown.	-0-	0.00%	None
Total amount of time of ethylene oxide emission concentration exceedances during the reporting period due to control equipment problems.	-0-	0.00%	None
Total amount of time of ethylene oxide emission concentration exceedances during the reporting period due to process problems.	-0-	0.00%	None
Total amount of time of ethylene oxide emission concentration exceedances during the reporting period due to other known causes.	- 0-	0.00%	None
Total amount of time of ethylene oxide emission exceedances during the reporting period.	-0-	0.00%	There were no weeks when monitoring indicated exceedances.

Table 4

6 month report for period ending 06/30/17

CMS Performance Summary – Safe Cell Control Technology			
Description	Hours during the reporting period	Duration of excess emissions	Comments
Total amount of operating time available during the reporting period.	4344 hours (26 weeks)	N/A	None.
Total amount of CMS downtime due to monitoring equipment malfunctions.	-0-	N/A	None.
Total amount of CMS downtime due to non-monitoring equipment malfunctions.	-0-	N/A	None.
Total amount of CMS downtime due to quality assurance/quality control calibrations.	-0-	N/A	None.
Total amount of CMS downtime due to other known causes.	-0- hours	N/A	None.
Total amount of CMS downtime due to other unknown causes.	-0-	N/A	None.
Total amount of hours during the reporting period of CMS downtime.	-0- hours	N/A	None.